

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:

MARIAH D. HERNANDEZ,  
  
Debtor.

Case No.: 24-14880

Chapter: 13

Hearing Date: November 26, 2024

Judge: ABA

**CERTIFICATION OF LANDLORD IN SUPPORT  
OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, David Klein, Regional Manager for Goldcrest Properties a/k/a East Park Apartments, landlord in the above captioned case (the “Landlord”), submits this Certification in support of the Motion for Relief from the Automatic Stay filed on November 4, 2024.

1. I am fully familiar with the debtor’s rental payment history because I am Regional Manager to the Landlord of the property rented by the debtor.
2. The property is located at 1047 East Park Avenue, Unit E5, Vineland, NJ 08360
3. The debtor filed for bankruptcy on May 13, 2024.

4. Pre-petition:

☒ The Landlord started an eviction action in the New Jersey state court and a copy of the complaint is attached as Exhibit A, or

☐ The Landlord did not start an eviction action.

5. Pre-petition:

☐ The Landlord obtained a Judgment for Possession and a copy of the Judgment is attached as Exhibit B, or

☒ The Landlord did not obtain a Judgment for Possession.

6. The Landlord is seeking relief from the automatic stay to:

☐ enforce the Judgment of Possession;

☒ pursue its state court rights because of the debtor's nonpayment of rent;

☐ pursue its state court rights because of debtor's endangerment of the property in the 30 days before the petition date *[explain below]*

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☐ pursue its state court rights because the debtor illegally used, or allowed to be used, controlled substances on the property in the thirty (30) days before the petition date *[explain below]*

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☐ other *[explain]* \_\_\_\_\_

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7. As of November 1, 2024, the amount of the debtor's monthly rental payment is \$975.00.

8. Pre-petition, the debtor owed rent totaling \$19,974.63, which represents unpaid rent and other charges for at least 20 months.

9. The debtor's post-petition payment history is annexed hereto as Exhibit B.
10. Post-petition, the debtor owes rent totaling \$3,281.63, which represents unpaid rent for 3 months, plus late and other charges.
11. The debtor's failure to pay rent is cause for relief from the automatic stay.
12. Through this motion, the Landlord requests relief from the automatic stay so the Landlord may initiate or continue an action in the state court to remove debtor from the rented premises.

I certify under penalty of perjury that the above is true.

Dated: November 4, 2024

/s/ David Klein  
David Klein  
Regional Manager for Landlord